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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 RAMON AVENDANO-SOTO AND
JORGE ALFREDO SOTO,
15 Defendant.
16

Case No. 2:20-CR-003-APG-EJY

STIPULATION TO CONTINUE
REPLY DEADLINE TO
GOVERNMENT'S RESPONSE TO
MOTION TO COMPEL (ECF NO. 53)
(First Request)

17
18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
19 Trutanich, United States Attorney, and Kevin Douglas Schiff, Assistant United States Attorney,
20 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
21 and Raquel Lazo, Assistant Federal Public Defender, counsel for Ramon Avendano-Soto, and
22 Christopher R. Oram, counsel for Jorge Alfredo Soto, that the reply deadline to the
23 Government's Response (ECF No. 53) to Defendant's Motion to Compel (ECF No. 48)
24 currently due August 19, 2020 be vacated and set to a date and time convenient to this Court,
25 but no sooner than fourteen (14) days.

26 This Stipulation is entered into for the following reasons:

1 1. Defense counsel requires additional time to file a reply to the government's
2 response. Defense counsel is currently preparing for upcoming evidentiary hearings in two
3 cases – *United States v. Carter*, 19-cr-093-RFB, and *United States v. Brown*, 18-cr-18-089-
4 RFB.

5 2. The defendants are not incarcerated and do not object to the continuance.

6 3. The parties agree to the continuance.

7 4. The additional time requested herein is not sought for purposes of delay, but
8 merely to allow counsel for defendant sufficient time within which to be able to effectively
9 prepare the reply.

10 5. Additionally, denial of this request for continuance could result in a miscarriage
11 of justice.

12 This is the first request to continue the reply deadline date filed herein.

13 DATED this 14th day of August, 2020.

14
15 RENE L. VALLADARES
16 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

17 /s/ Raquel Lazo
18 By _____
19 RAQUEL LAZO
Assistant Federal Public Defender

/s/ Kevin Douglas Schiff
By _____
KEVIN DOUGLAS SCHIFF
Assistant United States Attorney

20 /s/ Christopher R. Oram
21 By _____
22 CHRISTOPHER R. ORAM
23 Counsel for Jorge Alfredo Soto
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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 RAMON AVENDANO-SOTO AND
7 JORGE ALFREDO SOTO,

8 Defendant.

Case No. 2:20-cr-00003-APG-EJY

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

9
10 FINDINGS OF FACT

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. Defense counsel requires additional time to file a reply to the government's
14 response. Defense counsel is currently preparing for upcoming evidentiary hearings in two
15 cases – *United States v. Carter*, 19-cr-093-RFB, and *United States v. Brown*, 18-cr-18-089-
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21 prepare the reply.

22 5. Additionally, denial of this request for continuance could result in a miscarriage
23 of justice.

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON AVENDANO-SOTO AND
JORGE ALFREDO SOTO,

Defendant.

Case No. 2:20-CR-003-APG-EJY

ORDER

ORDER

IT IS THEREFORE ORDERED that defense counsel's Reply to the Government's Response (ECF No. 53) to Defendant's Motion to Compel (ECF No. 48) currently due on August 19, 2020 be vacated and continued to September 2, 2020.

DATED this 17th day of August, 2020.


UNITED STATES MAGISTRATE JUDGE